

# **EXHIBIT A**

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**ORDER APPROVING STIPULATION AND AGREED SCHEDULING ORDER  
GOVERNING DEBTORS' OBJECTION TO PROOFS OF CLAIM  
FILED BY TAI MO SHAN LIMITED**

Upon the *Certification of Counsel* and the *Stipulation and Agreed Scheduling Order Governing Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* (the "Stipulation")<sup>2</sup> entered into between the Debtors and TMS, a copy of which is attached hereto as **Exhibit 1**; and the Bankruptcy Court having jurisdiction to consider approval of the Stipulation; and it appearing that sufficient notice of the Stipulation has been given; and after due deliberation; and good and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. This Bankruptcy Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order and the Stipulation.

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>2</sup> Terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable John T. Dorsey  
Chief United States Bankruptcy Judge

# **EXHIBIT 1**

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION AND AGREED SCHEDULING ORDER GOVERNING DEBTORS’  
OBJECTION TO PROOFS OF CLAIM FILED BY TAI MO SHAN LIMITED**

This stipulation and agreed scheduling order (the “Stipulation”) is made and entered into by and among (i) FTX Trading Ltd., Alameda Research Ltd. (“Alameda”), and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), and (ii) Tai Mo Shan Limited (“TMS,” and together with the Debtors, the “Parties”), by and through their respective undersigned counsel. In support of this Stipulation, the Parties respectfully state as follows:

WHEREAS, on June 28, 2023, TMS filed proof of claim number 5475 against Alameda;

WHEREAS, on May 15, 2024, TMS filed proof of claim number 94967 against Alameda, amending proof of claim number 5475;

WHEREAS, on July 5, 2024, TMS filed proof of claim number 95768 against Alameda, amending proofs of claim numbers 5475 and 94967;

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on July 10, 2024, the Debtors filed the *Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 20030] (the "Objection") objecting to proofs of claim numbers 5475 and 94967 and the *Declaration of Steven P. Coverick in Support of Debtors' Objection to Proof of Claim Filed by Tai Mo Shan Limited* [D.I. 20034];

WHEREAS, on August 19, 2024, TMS filed the *Response of Tai Mo Shan Limited to Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 23341] (the "Response");

WHEREAS, the Parties have discussed in good faith a schedule with respect to the litigation of proofs of claim numbers 5475, 94967, and 95768 filed by TMS and the Debtors' Objection thereto.

**NOW, THEREFORE**, it is hereby stipulated and agreed, and upon approval by the Court it shall be **SO ORDERED**:

1. Agreed Scheduling Order. The Parties agree to the following scheduling order (the "Agreed Scheduling Order"):

EVENT	DEADLINE
Service of any discovery requests by either Party	October 11, 2024
Parties to meet and confer regarding the scope of any discovery requests	October 18, 2024
Service of any non-party discovery requests by either Party	November 8, 2024
Completion of document productions	December 13, 2024
Completion of fact witness depositions	January 24, 2025
Debtors to submit expert report/rebuttal to TMS's expert report (including workpapers)	January 31, 2025
TMS to submit expert rebuttal report to Debtors (including workpapers)	February 21, 2025
Completion of expert discovery	February 28, 2025
Evidentiary hearing on proofs of claim numbers 5475, 94967, and 95768 filed by TMS	To Be Determined Upon Court's Availability

2. Pending approval of this Stipulation by the Court, each of the Parties agrees that it is and will be bound by this Stipulation and waives any right to object to approval by the Court.

3. If approved by the Court, the Agreed Scheduling Order shall be modified only by a writing signed by all Parties approved by the Court, or otherwise upon entry of an order of the Court entered upon notice to the Parties.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of the Proposed Scheduling Order.

Dated: October 3, 2024  
Wilmington, Delaware

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